Date **Change Number** Federal Facility Agreement and Consent Order **Change Control Form** Do not use blue ink. Type or print using black ink. M-26-05-01 December 27, 2005 Phone Originator 373-7939 G. L. Sinton, U.S. Department of Energy Class of Change [X] II - Executive Manager [ ] III - Project Manager [ ] I - Signatories Change Title Modify Interim Milestone M-26-01P to Require Submittal of the Calendar Year 2005 Hanford Site Land Disposal Restrictions Summary Report. Description/Justification of Change The U.S. Department of Energy (DOE) and the State of Washington Department of Ecology (Ecology) are conducting a pilot activity for Land Disposal Restriction (LDR) reporting under the M-026-01 milestone series. For only the Calendar Year (CY) 2005 LDR reporting activities, this pilot activity will establish a Hanford LDR Summary Report. The Hanford LDR Summary Report will contain elements from the Hanford LDR Report considered to be important for reporting purposes. DOE and Ecology have determined through the monthly Project Manager Meetings which elements of the annual Hanford LDR Report should be reported in the CY2005 Hanford LDR Summary Report. The due date of the M-026-01P milestone and subsequent M-026-01 milestones are not being modified by the change request. After DOE submits the CY2005 Hanford LDR Summary Report and the primary document process is completed, DOE and Ecology will make a decision on the development of future Hanford LDR Summary Reports. Impact of Change The change would allow DOE to submit an LDR summary report for the CY 2005 requirement. EDMC **Affected Documents** Hanford Federal Facility Agreement and Consent Order (as amended) and the Calendar Year 2005 Hanford LDR Report. Approvals Page 1 of 4

## Change Form M-26-05-01

Page 2 of 4

Tri-Party Agreement Interim Milestone M-26-01P (due on April 30, 2006) is modified by this change form as shown below, using strikeout for text deletions and shading for text additions.

M-026-01P

SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS SUMMARY REPORT AS A PILOT PROJECT IN ACCORDANCE WITH THE AGREEMENT REQUIREMENTS TO COVER THE PERIOD FROM 1/1/2005 OF THE PREVIOUS YEAR THROUGH 12/31/2005 OF THE REPORTING YEAR. THE HANFORD LAND DISPOSAL RESTRICTIONS SUMMARY REPORT WILL CONTAIN THE FOLLOWING ELEMENTS TAKEN FROM THE CALENDAR YEAR 2004 HANFORD SITE MIXED WASTE LAND DISPOSAL RESTRICTION REPORT (DOE/RL-2005-23):

04/30/2006

- SECTION 2.1: SUMMARY INVENTORY OF WASTE TREATMENT GROUPS AND FORECAST GENERATION RATES
- SECTION 3.0: COMPLIANCE ASSESSMENTS OF MIXED WASTE AND POTENTIAL MIXED WASTE
- SECTION 3.1: INTRODUCTION
- SECTION 3.2: ASSESSMENT SCHEDULES
- APPENDIX C: POTENTIAL MIXED WASTE
- TABLE 2-1: STORED VOLUMES OF MIXED WASTE AND GENERATION PROJECTIONS
- TABLE 2-2: TREATABILITY GROUP SUMMARY OF STORAGE, CHARACTERIZATION, AND TREATMENT ACTIVITIES
- TABLE 3-1: SUMMARY OF DOE-RL ASSESSMENT RESULTS
- TABLE 3-2: DOE-RL ASSESSMENTS FOR CALENDAR YEARS 2005 THROUGH 2007 (UPDATED FOR NEXT THREE YEARS)
- TABLE 3-3: SUMMARY OF DOE-ORP ASSESSMENT RESULTS
- TABLE 3-4: DOE-ORP ASSESSMENTS FOR CALENDAR YEARS 2005 THROUGH 2007 (UPDATED FOR NEXT THREE YEARS)
- TABLE 13-1: SUMMARY OF CHARACTERIZATION INFORMATION
  FOR EACH TREATABILITY GROUP
- TABLE 14-1: SUMMARY OF TREATMENT INFORMATION FOR EACH TREATABILITY GROUP

IN ADDITION, THE SUMMARY REPORT WILL INCLUDE A TABLE CONTAINING THE STORAGE VOLUME AND THE NUMBER OF CONTAINERS REPORTED FOR THE FOLLOWING HANFORD SITE LOCATIONS: CWC, LLBG, WRAP, PFP, T PLANT COMPLEX, WSCF, 325 HWTU, 324, 327, 200 ETF, AND 222-S.

FOLLOWING ECOLOGY APPROVAL OF THE HANFORD LAND DISPOSAL RESTRICTIONS SUMMARY REPORT, ECOLOGY AND DOE WILL DECIDE IF AND TO WHAT DEGREE A SUMMARY REPORT CAN BE USED TO SATISFY FUTURE ANNUAL LAND DISPOSAL RESTRICTION REPORTING REQUIREMENTS. IF AN AGREEMENT IS REACHED ON CONTINUED USE OF THE SUMMARY REPORT, A CHANGE REQUEST WILL BE PROCESSED TO IMPLEMENT ANY AGREED UPON CHANGES.

DOE'S ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT:

1) WILL BE EQUIVALENT TO (I.E. SHALL MEET ALL SUBSTANTIVE REQUIREMENTS OF) SITE TREATMENT PLANS AS REQUIRED BY THE FEDERAL FACILITY COMPLIANCE ACT OF 1992 (FFCA) AND 2)—WILL MEET ALL REQUIREMENTS OF ECOLOGY'S FINAL DETERMINATION IN THIS MATTER DATED MARCH 29, 2000.

THE REPORT SHALL INCLUDE A DESCRIPTION OF ACTIVITIES PLANNED AND TAKEN IN ACCORDANCE WITH AGREEMENT REQUIREMENTS AND PRIOR ANNUAL LDR REPORTS TO ACHIEVE FULL COMPLIANCE WITH AGREEMENT AND LDR REQUIREMENTS. THE REPORT SHALL UPDATE ALL INFORMATION CONTAINED IN THE LDR PLAN AND THE PRIOR ANNUAL LDR REPORT, INCLUDING PLANS AND SCHEDULES.

## Change Form M-26-05-01 Page 3 of 4

THE FORMAT FOR THE REPORT SHALL BE BASED ON EQUIVALENCY WITH SITE TREATMENT PLAN REQUIREMENTS OF THE FFCA, ECOLOGY'S FINAL DETERMINATION IN THIS MATTER DATED MARCH-29, 2000, AND THE "REQUIREMENTS FOR HANFORD LDR PLAN,"—ISSUED BY EPA AND ECOLOGY ON APRIL 10, 1990.—ADDITIONALLY, THE REPORT SHALL DESCRIBE ANY OTHER STUDIES OR EFFORTS THAT HAVE BEEN OR WILL BE UNDERTAKEN TO-IDENTIFY ALTERNATIVES TO LAND DISPOSAL OF MIXED WASTES.—THE NONRADIOACTIVE PORTION OF ANY MIXED WASTES THAT ARE REGULATED UNDER WASHINGTON STATE—ONLY REGULATIONS SHALL BE ADDRESSED IN THE REPORT. THE REPORT SHALL BESUBMITTED AS A PRIMARY DOCUMENT.

THE REPORT SHALL DOCUMENT AGREEMENT MAJOR AND INTERIM MILESTONES FOR ACHIEVING COMPLIANCE WITH LDR TREATMENT REQUIREMENTS AT TSD MIXED WASTE-UNITS BY: 1) IDENTIFYING AND REPORTING PROCRESS AGAINST AGREEMENT MILESTONES AND PROPOSING THE ESTABLISHMENT OF MILESTONES IN THE INSTANCE OF TSD MIXED WASTES NOT YET COVERED UNDER THE ACREEMENT AND FOR THE MODIFICATION OF CURRENT HFFACO-SCHEDULES AS NECESSARY TO ACHIEVE COMPLIANCE WITH LDR TREATMENT REQUIREMENTS IN A MANNER EQUIVALENT TO STPS AS REQUIRED BY THE FFCA. THESE MILESTONES SHALL BE BASED ON SIGNIFICANT EVENTS IDENTIFIED IN THE LDR REPORT (I.E. SCHEDULES EQUIVALENT TO THOSE OF SITE TREATMENT PLANS REQUIRED BY THE FFCA) AND WILL BE SHOWN AS SCHEDULES WHICH ARE UPDATED ANNUALLY AS PART OF THE REPORT. APPROPRIATE MILESTONES WILL BE INCORPORATED IN THE AGREEMENT VIA THE CHANGE PROCESS DEFINED IN SECTION 12 THE ACTION PLAN UPON ISSUANCE OF THE APPROVED REPORTS.

## Change Form M-26-05-01

## Page 4 of 4

Tri-Party Agreement Interim Milestone M-26-01Q (due on April 30, 2007) and succeeding M-26-01 interim milestones are not modified by this change request as shown below.

M-026-010

SUBMIT AN ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT IN ACCORDANCE WITH AGREEMENT REQUIREMENTS TO COVER THE PERIOD FROM 1/1 OF THE PREVIOUS YEAR THROUGH 12/31 OF THE REPORTING YEAR.

04/30/2007 AND ANNUALLY THEREAFTER

DOE'S ANNUAL HANFORD LAND DISPOSAL RESTRICTIONS REPORT: 1) WILL BE EQUIVALENT TO (I.E. SHALL MEET ALL SUBSTANTIVE REQUIREMENTS OF) SITE TREATMENT PLANS AS REQUIRED BY THE FEDERAL FACILITY COMPLIANCE ACT OF 1992 (FFCA) AND 2) WILL MEET ALL REQUIREMENTS OF ECOLOGY'S FINAL DETERMINATION IN THIS MATTER DATED MARCH 29, 2000.

THE REPORT SHALL INCLUDE A DESCRIPTION OF ACTIVITIES PLANNED AND TAKEN IN ACCORDANCE WITH AGREEMENT REQUIREMENTS AND PRIOR ANNUAL LDR REPORTS TO ACHIEVE FULL COMPLIANCE WITH AGREEMENT AND LDR REQUIREMENTS. THE REPORT SHALL UPDATE ALL INFORMATION CONTAINED IN THE LDR PLAN AND THE PRIOR ANNUAL LDR REPORT, INCLUDING PLANS AND SCHEDULES.

THE FORMAT FOR THE REPORT SHALL BE BASED ON EQUIVALENCY WITH SITE TREATMENT PLAN REQUIREMENTS OF THE FFCA, ECOLOGY'S FINAL DETERMINATION IN THIS MATTER DATED MARCH 29, 2000, AND THE "REQUIREMENTS FOR HANFORD LDR PLAN," ISSUED BY EPA AND ECOLOGY ON APRIL 10, 1990. ADDITIONALLY, THE REPORT SHALL DESCRIBE ANY OTHER STUDIES OR EFFORTS THAT HAVE BEEN OR WILL BE UNDERTAKEN TO IDENTIFY ALTERNATIVES TO LAND DISPOSAL OF MIXED WASTES. THE NONRADIOACTIVE PORTION OF ANY MIXED WASTES THAT ARE REGULATED UNDER WASHINGTON STATE-ONLY REGULATIONS SHALL BE ADDRESSED IN THE REPORT. THE REPORT SHALL BE SUBMITTED AS A PRIMARY DOCUMENT.

THE REPORT SHALL DOCUMENT AGREEMENT MAJOR AND INTERIM MILESTONES FOR ACHIEVING COMPLIANCE WITH LDR TREATMENT REQUIREMENTS AT TSD MIXED WASTE UNITS BY: 1) IDENTIFYING AND REPORTING PROGRESS AGAINST AGREEMENT MILESTONES AND 2) PROPOSING THE ESTABLISHMENT OF MILESTONES IN THE INSTANCE OF TSD MIXED WASTES NOT YET COVERED UNDER THE AGREEMENT AND FOR THE MODIFICATION OF CURRENT HFFACO SCHEDULES AS NECESSARY TO ACHIEVE COMPLIANCE WITH LDR TREATMENT REQUIREMENTS IN A MANNER EQUIVALENT TO STPS AS REQUIRED BY THE FFCA. THESE MILESTONES SHALL BE BASED ON SIGNIFICANT EVENTS IDENTIFIED IN THE LDR REPORT (I.E. SCHEDULES EQUIVALENT TO THOSE OF SITE TREATMENT PLANS AS REQUIRED BY THE FFCA) AND WILL BE SHOWN AS SCHEDULES WHICH ARE UPDATED ANNUALLY AS PART OF THE REPORT. APPROPRIATE MILESTONES WILL BE INCORPORATED IN THE AGREEMENT VIA THE CHANGE PROCESS DEFINED IN SECTION 12 OF THE ACTION PLAN UPON ISSUANCE OF THE APPROVED REPORTS.